

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) Criminal No. 02-30043-MAP
)
 (1) ALEKSEI SAFANOV,)
 (2) IVAN TELEGUZ,)
 (3) ROMAN ZHIRNOV,)
 (4) ANDREY BUYNOSKIY,)
 (5) MICHAEL QUICKEL,)
 Defendants.)

Government's Motion for Order of Excludable Delay

(Assented To)

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, moves for an order of excludable delay under the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(8)(A) & 3161(h)(8)(B)(ii) & (iv), from September 22, 2004, to November 19, 2004.

September 22, 2004, is the day that Magistrate Judge Neiman denied Aleksei Safanov's last discovery motion as moot. November 19, 2004, is the date that the defendants' pretrial motions are due to be filed. This is a complex case involving five defendants, over twenty firearms and events in at least three states. Numerous consensual recordings were made. One of the defendants is incarcerated in Virginia on unrelated charges.

The ends of justice served by excluding this time from the Speedy Trial Act outweigh the best interest of the public and defendant in a speedy trial. This Speedy Trial Act exclusion is appropriate, in part, because of the need for the defendants' attorneys to review discovery and prepare their pretrial motions.

Counsel for all five defendants have assented to this request.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

by: /s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney

Date: October 29, 2004

CERTIFICATE OF SERVICE

October 29, 2004

I certify that I have caused to be served a copy of the foregoing document by mail on Alan Black, Esq., counsel for Aleksei Safanov, David Wenc, Esq., counsel for Ivan Teleguz, Charles J. Sclafani, Jr., Esq., counsel for Roman Zhirnov, Joseph D. Bernard, Esq., counsel for Andrey Buynovskiy, and Richard J. Maggi, Esq., counsel for Michael Quickel.

/s/ Kevin O'Regan
Kevin O'Regan
Assistant U.S. Attorney